

# EXHIBIT E



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FOUNDED 1866

March 5, 2007

**By Email**

Allan Diamond  
Diamond McCarthy Taylor Finley & Lee, LLP  
Two Houston Center  
909 Fannin Street, Suite 1500  
Houston, Texas 77010

Re: In re Parmalat: PCFL vs. Bank of America

Dear Allan:

I am writing to request the deposition of Andrea Petrucci, a former director of Parmalat Capital Finance Limited. The testimony for PCFL's 30(b)(6) witness on Friday, March 2, suggested that you intend to rely on Mr. Petrucci as an "innocent insider" who was allegedly unaware of, and would have acted to prevent, the fraud being perpetrated by PCFL. The witness also made it clear that you have been in touch with Petrucci within the last two months. Given the prior agreement between our firms that the March 5 discovery cut-off date would not apply to any discovery requests stemming from the testimony of PCFL's 30(b)(6) witness, please provide us with a date for Mr. Petrucci's deposition as soon as possible.

Kind regards,

A handwritten signature in cursive script that reads "Brian D. Vann / ESI".

Brian D. Vann

cc: Kathy Puzone